Law Offices of Joseph L. Manson III

Benjamin Chernow 600 Cameron St. Alexandria, VA 22314

July 14, 2020

VIA ECF

The Honorable Laura T. Swain Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Universitas Education, LLC v. Nova Group, Inc., Case No. 1:11-cv-01590 (LTS) (HBP)

Dear Judge Swain,

We represent Universitas Education, LLC ("Universitas") in the above-captioned matter. We write this letter in response to the Order to Show Cause filed in this Court on July 10, 2020 regarding the applicability of Restraining Notices upon Lincoln National Life Insurance Company ("Lincoln"). Upon further review and examination, Universitas believes that the Restraining Notice issued to Lincoln expired on November 30, 2019 and that Lincoln's business activities are no longer restrained. Accordingly, Universitas does not believe there is cause to continue restraining Lincoln's business activities. A copy of this letter has been provided to Lincoln in accordance with the directives of the Order to Show Cause.

Respectfully Submitted,

/s/ Benjamin Chernow
Benjamin Chernow
600 Cameron St.
Alexandria, VA 22314
(301) 633-2163
bchernow@jmansonlaw.com

Counsel for Petitioner

Cc: All Interested Counsel (by ECF)